

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZEV YORAMAN

Write the full name of each plaintiff.

20 CV 0779

(Include case number if one has been assigned)

-against-

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

METROPOLITAN TRANSPORTATION AUTHORITY, ANDREW CUOMO
PERSONALLY, AND AS GOVERNOR OF NEW YORK, AND AS GOVERNOR OVERSEER
OF MTA AND APPOINTEE TO ITS BOARD, PATRICK J. FOYE - PERSONALLY,
AND AS MTA CHAIRMAN, OWEN MONAGHAN - PERSONALLY AND AS MTA
CHIEF OF POLICE, ANALISA ROSARIO - PERSONALLY AND AS MTA POLICE
DETECTIVE, ANALISA ROSARIO UPON KNOWLEDGE AND BELIEF IS ALSO
KNOWN AS ANALISA FRANCA JAMES-ROSARIO, DANIEL DEMCZUK - PERSONALLY
AND AS MTA POLICE OFFICER, JOHN DOE 1 PERSONALLY AND AS MTA POLICE OFFICER-
DEMCZUK'S PARTNER, JANE DOE 1 PERSONALLY AND AS MTA POLICE SGT, JOHN DOE 2
PERSONALLY AND AS MTA POLICE OFFICER, JOHN DOE 3 PERSONALLY AND AS MTA POLICE
DETECTIVE, JANE DOE 2 PERSONALLY AND AS MTA POLICE ASSISTANT TO JOHN DOE 3 PERSONALLY
AND AS MTA POLICE DETECTIVE, MTA JOHN DOES 4-50, MTA JANE DOES 3-50, JASON DOUGLAS BARNES PERSONALLY
AND AS EMPLOYEE OF MTA AND AS MTA COUNSEL

Write the full name of each defendant. If you need more
space, please write "see attached" in the space above and
attach an additional sheet of paper with the full list of
names. The names listed above must be identical to those
contained in Section II.

DEFENDANTS CONTINUED: CYRUS VANCE PERSONALLY AND AS NEW YORK COUNTY DISTRICT ATTORNEY,
ASSISTANT D.A. KATHLEEN COULSON PERSONALLY AND AS ASST. D.A., JULIAN SHARTLAND PERSONALLY
AND AS ASST. D.A., KELLY KEATING PERSONALLY AND AS ASST. D.A., D.A. J. DOES 1-100 PERSONALLY
AND AS EMPLOYEES OF D.A.'S OFFICE
U.S. DEPARTMENT OF TRANSPORTATION, FEDERAL RAIL ADMINISTRATION, FEDERAL TRANSIT ADMINISTRATION,
U.S. FEDERAL AGENCIES DOE 1-30 -

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

42 USC 1983 DISCRIMINATION, 42 USC 12101 DISABILITY ACT, 14TH AMENDMENT TO
US CONST., US CONST. AMENDMENT 2ND AMENDMENT - UNDER 28 USC 1367
NY STATE LAWS: FALSE IMPRISONMENT, MALICIOUS PROSECUTION, - ~~FEED~~ 4
DEFAMATION PARSO, FEDERAL CIVIL RICO, ALSO 18 USC 247, 18 USC 953

B. If you checked Diversity of Citizenship**1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
 (Plaintiff's name)

 (State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

_____.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

<u>ZEY</u>		<u>OURMAN</u>
First Name	Middle Initial	Last Name
<u>1274-49TH STREET</u>	<u># 525</u>	
Street Address		
<u>KINGS, BROOKLYN</u>	<u>NEW YORK</u>	<u>11219</u>
County, City	State	Zip Code
_____ Telephone Number	_____ Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

- Defendant 1: METROPOLITAN TRANSPORTATION AUTHORITY
 First Name Last Name
FIRST 14 DEFENDANTS ALL WITH MTA IN THEIR TITLES
 Current Job Title (or other identifying information)
2 BROADWAY
 Current Work Address (or other address where defendant may be served)
NEW YORK NEW YORK 10004
 County, City State Zip Code
- Defendant 2: NEW YORK COUNTY DISTRICT ATTORNEY'S OFFICE
 First Name Last Name
DEFENDANTS #15 THROUGH #19 ALL WITH DA IN THEIR TITLES
 Current Job Title (or other identifying information)
100 CENTRE STREET, 80 CENTRE STREET
 Current Work Address (or other address where defendant may be served)
NEW YORK NEW YORK
 County, City State Zip Code
- Defendant 3: U.S. DEPARTMENT OF TRANSPORTATION, FEDERAL RAIL ADMINISTRATION
 First Name Last Name
FEDERAL TRANSIT ADMINISTRATION
 Current Job Title (or other identifying information)
1200 NEW JERSEY AVE., S.E.
 Current Work Address (or other address where defendant may be served)
WASHINGTON D.C. 20590
 County, City State Zip Code

Defendant 4:

US FEDERAL AGENCIES DOE 1-30

First Name

Last Name

Current Job Title (or other identifying information)

NAMES AND ADDRESSES UPON DISCOVERY

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIMPlace(s) of occurrence: GRAND CENTRAL TERMINAL, 100 CENTRE ST. NYC, 2 BROADWAY NYCDate(s) of occurrence: JANUARY 29, 2019 - THROUGH JULY 8, 2019, AUGUST 16, 2019**FACTS:**30 DAYS HAVE ELAPSED SINCE THIS CLAIM WAS PRESENTED TO MTA WHICH NEGLECTED TO MAKE AN OFFER

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed. FALSE ARREST, IMPRISONMENT AND ANTI-SEMITIC ISSUE!

ON 1/29/2019, IN G.C. TERMINAL DANIEL DEMCZUK-MTA PD AND HIS PARTNER JOHN DOE 1 ARRESTED AND IMPRISONED FOR NO LAWFUL REASON THIS PLAINTIFF, DEMCZUK EMPTIED CONTENTS OF PLAINTIFF'S BACK PACK ON WALKWAY FLOOR BY JAIL CELL, DEMCZUK STEPPED ON PLAINTIFF'S JEWISH RITUAL OBJECTS AND MADE ANTI-SEMITIC REMARKS, JOHN DOE 1 STEPPED ON PLAINTIFF'S JEWISH RITUAL OBJECTS, JOHN DOE 2 STEPPED ON JEWISH RITUAL OBJECTS AND GUIDED A VISIBLY HOMELESS MAN TO DO THE SAME, PLAINTIFF ASKED SGT-JANE DOE 1 TO PICK UP JEWISH OBJECTS FROM FLOOR - JANE DOE 1 REFUSED, JOHN DOE 3 WAS PRESENT IN MTA POLICE STATION WHILE ABOVE WAS GOING ON AND TOOK NO ACTION, JANE DOE 2 WAS PRESENT IN POLICE STATION WHILE ABOVE WAS GOING ON AND TOOK NO ACTION, CHIEF MTA POLICE SGT MONAGHAN ^{HAD} HAS THE ABILITY OR SHOULD HAVE THE ABILITY TO VIEW REALTIME VIDEO OF CAMERAS IN MTA POLICE STATION, MONAGHAN KNEW OR SHOULD HAVE KNOWN WHAT WAS GOING ON IN RELATIONSHIP TO ABOVE AND TOOK NO ACTION - MONAGHAN'S OFFICE IS RIGHT ABOVE POLICE STATION - MONAGHAN DID NOT COME RUNNING DOWN TO DEAL WITH THE SITUATION - MONAGHAN DID NOT DELEGATE TO AN ASSISTANT TO DEAL WITH THE SITUATION - NO MTA PD SUPERVISOR ON REGULAR SCHEDULED ROUNDS - PUT AN END TO THE SITUATION OF PLAINTIFF'S JEWISH RITUAL OBJECTS ON FLOOR - MONAGHAN IS DELINQUENT IN SUPERVISING AND TRAINING HIS OFFICERS -

MTA JOHN DOES 4-50 AND MTA JANE DOES 3-50 REPRESENT ALL PERSONS IN MTA POLICE CHAIN OF COM. CIVILIAN MTA HIERARCHY RESPONSIBLE FOR VIOLATIONS AGAINST PLAINTIFF THROUGH DELINQUENCY, MAINTAINING PROPER TRAINING OR SUPERVISING PROTOCOL -

PATRICK FOYE IS DELINQUENT IN SUPERVISING MONAGHAN, AND IN IMPLEMENTING AND SUPERVISING THE POLICIES OF THE MTA WHICH RESULTED IN VIOLATIONS OF PLAINTIFFS RIGHTS - ANDREW CUOMO IS THE ULTIMATE CONTROLLER OF THE MTA AND IS RESPONSIBLE FOR VIOLATIONS OF PLAINTIFFS RIGHTS - THE MTA PD DID MALICIOUSLY PROSECUTE THIS PLAINTIFF ON ALL CHARGES FOR NO LAWFUL REASON - ON AUGUST 16, 2019 AT THE 50-H HEARING MTA COUNSEL JASON DOUGLAS BARNES MADE AN ANTI-SEMITIC REMARK TO PLAINTIFF - BARNES IS A PROMOTER OF GERMAN CULTURE AND HISTORY - THE MTA HIERARCHY SHOULD HAVE KNOWN THIS AND INDEED DID KNOW THIS AND YET STILL PUT BARNES ON A HEARING DEALING WITH A CLAIM OF ANTI-SEMITISM -

CONTINUED, PAGE 6-A

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

HIGH BLOOD PRESSURE, ^{AND FEAR AND ANXIETY} EMOTIONAL DISTRESS, DEFAMATION PER SE, VIOLATION OF PLAINTIFF'S CIVIL RIGHTS, HUNGER, MTA PD'S FALSE DEFAMATORY STATEMENTS TO FOREIGN THIRD WORLD DIPLOMAT BECAME INTERNATIONALLY VIRAL, CAUSING PLAINTIFF TO PUT A LIMIT ON TRAVEL POSSIBILITIES, IMPRISONING PLAINTIFF WITHIN BOUNDARIES OF UNITED STATES, PLAINTIFF FACES CONSTANT DANGERS EVEN WITHIN THE UNITED STATES, PLAINTIFF FACES DANGER AS A COMMUTER DUE TO MTA PD'S ACTIONS, PLAINTIFF WAS SUBJECTED TO RELIGIOUS PERSECUTION, MALICIOUS PROSECUTION
IV. RELIEF NOT LIMITED TO ABOVE, PLAINTIFF MUST AVOID GRAND CONFRONTATION DUE TO DANGERS TO HIM

State briefly what money damages or other relief you want the court to order.

50 MILLION DOLLARS COMPENSATORY
50 MILLION DOLLARS PUNITIVE

CONTINUED FROM PAGE 6

III STATEMENT OF CLAIM FACTS; CONTINUED

MEXICAN DOCUMENT, ISSUE

THERE CAME A TIME WHILE PLAINTIFF WAS IN JAIL THAT PLAINTIFF HEARD DEMCZUK YELLING INTO A PHONE CONCERNING THE PLAINTIFF - 'THE PERP' HAS A "FORGED MEXICAN PASSPORT" (A FALSE AND DEFAMATORY STATEMENT)

THERE CAME A TIME WHILE PLAINTIFF WAS IN JAIL THAT MTA DETECTIVE JOHN DOE 3 TOLD PLAINTIFF "YOU ARE BEING CHARGED WITH FELONY POSSESSION OF A FORGED MEXICAN PASSPORT WHICH YOU USED TO DEFRAUD AND INJURE ANOTHER." JANE DOE 2 WAS WITH JOHN DOE 3 AT THIS TIME. UNLAWFUL

THERE CAME A TIME, MTA DETECTIVE ANALISA ROSARIO MADE CONTACT WITH A MEXICAN DIPLOMAT AND FALSELY STATED TO DIPLOMAT THAT PLAINTIFF ^{FALSE} POSSESSED A FORGED MEXICAN CONSULATE CARD. ROSARIO CONVEYED TO THE DIPLOMAT ALL INFORMATION CONCERNING THIS PLAINTIFF IN THE CRIMINAL CHARGES INCLUDING THE PLAINTIFF THREATENED 10 CUSTOMERS OF A FOOD ESTABLISHMENT (RESTAURANT) PLAINTIFF USED OBSCENE AND THREATENING GESTURES AND LANGUAGE TO EMPLOYEES AND CUSTOMERS OF FOOD ESTABLISHMENT (RESTAURANT) AS WELL AS ALL THE PARTICULARS OF THIS PLAINTIFF'S IDENTITY - ROSARIO DEFAMED THIS PLAINTIFF. ROSARIO HAD NO JURISDICTION TO CONTACT A FOREIGN GOVERNMENT → IN RELATIONSHIP TO THIS MATTER.

ROSARIO UNLAWFULLY CONVEYED SENSITIVE IDENTITY INFORMATION CONCERNING THIS PLAINTIFF TO THE MEXICO GOVERNMENT - PLACING THIS PLAINTIFF IN DANGER -

ROSARIO UNLAWFULLY CONVEYED SENSITIVE INFORMATION CONCERNING MTA SECURITY MATTERS TO THE MEXICO CONSULATE PLACING THE SAFETY OF THIS PLAINTIFF AS A COMMUTER IN DANGER, AND PLACING THE SAFETY OF ALL COMMUTERS IN DANGER. ROSARIO'S UNLAWFUL CONTACT WITH THE MEXICO GOVERNMENT, WAS FACILITATED BY THE MTA HIERARCHY ON THE HIGHEST LEVELS, OTHERWISE A CONTACT ON THIS LEVEL COULD NOT HAVE OCCURRED, INCLUDING CUOMO, FOYE, MONAGHAN AND JOHN DOES 4-50 AND JANE DOES 3-50 -

MEMBERS OF NEW YORK COUNTY DISTRICT ATTORNEY'S OFFICE COLLUDED WITH THE ABOVE ON THE MEXICO DOCUMENT ISSUE OVER WHICH THEY HAD NO JURISDICTION INCLUDING D.A. CYRUS VANCE, ADA KELLY HEATING, MATHLEEN COULSON, ADA WILLIAM SHARTLAND AND MEMBERS OF DA'S OFFICE JOHN DOES 1-50 AND JANE DOES 1-50 WHO DEALT WITH THE MEXICO DOCUMENT ISSUE - AND WHICH DAMAGED THIS PLAINTIFF.

ALL THE ABOVE DEFENDANTS IN THE MEXICO DOCUMENT ISSUE FROM THE MTA AND DISTRICT ATTORNEY ARE ALL IN COLLUSION → IN VIOLATING THIS PLAINTIFF'S RIGHTS -

DENIAL OF CASH FOR FOOD ISSUE

ALL OF THE ABOVE STATED ACTIONS, IN THIS STATEMENT OF CLAIM, THAT OCCURRED AGAINST THIS PLAINTIFF STEMMED FROM AN INITIAL INCIDENT WHEN A FOOD STAND - UHARO GRAIN BAR - UNDER DIRECT, OR INDIRECT, THROUGH SUBCONTRACT, - CONTRACT WITH THE MTA AND OPERATING ON MTA PROPERTY, REFUSED SERVICE TO SELL FOOD TO PLAINTIFF - EMPLOYEES OF GRAIN BAR REFUSED TO ACCEPT CASH FROM PLAINTIFF IN RETURN FOR FOOD. 11/29/2019
RESULTING IN EVENTS WHICH RESULTED IN THE FALSE ARREST OF PLAINTIFF BY MTA PD AND SUBSEQUENT VIOLATIONS OF PLAINTIFF'S RIGHTS BY MTA PD ET AL, - MTA VIOLATED THIS PLAINTIFF'S RIGHTS AND OTHERS BY MTA'S POLICY ALLOWING VENDORS ON MTA PROPERTY TO DENY THE USE OF CASH TO PURCHASE FOOD - CAUSING THIS PLAINTIFF TO SUFFER.

FEDERAL AGENCIES:

UPON KNOWLEDGE AND BELIEF; THOSE FEDERAL AGENCIES WHICH CONTRIBUTE TO THE MTA'S BUDGET BEAR RESPONSIBILITY FOR PLAINTIFF'S SUFFERING DUE TO LACK OF OVERSIGHT, MONITORING, INCLUDING ISSUES OF FUNDING - NOT LIMITED TO THOSE - AND NOT LIMITED TO U.S. DEPARTMENT OF TRANSPORTATION, FEDERAL RAIL ADMINISTRATION, FEDERAL TRANSIT ADMINISTRATION, US FEDERAL AGENCIES DOE 1-30, INCLUDING ISSUES OF RESPONSIBILITY OF MONITORING MTA WITHOUT CONTRIBUTIONS - SEE ATTACHMENTS

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

1/26/2020
 Dated
 ZEV
 First Name
 1274
 Street Address
 KINGS, BROOKLYN
 County, City
 49TH
 Middle Initial
 STREET
 Last Name
 # 525
 NY
 State
 11219
 Zip Code
 Plaintiff's Signature
 TOURMAN
 Telephone Number
 Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

To:
MTA General Counsel
2 Broadway, 4th floor, NY, NY 10017
Notice of Claim
Zev Yourman - complainant

Against :

Metropolitan Transportation Authority,

Patrick J. Foye - personally , and in his capacity as MTA

Chairman, Owen Monaghan - personally, and in his capacity as

MTA Chief of Police, Andrew Cuomo - personally, and in his

capacity as Governor overseer of MTA and appointer to its'

board, Daniel Demczuk - personally, and in his capacity as MTA

Police Officer, Jane Doe 1- personally and in her capacity

as MTA Police Sgt., John Doe 1- personally and in his capacity

as MTA Police Officer, John Doe 2 - personally and in his

capacity as MTA Police Officer, John Doe 3 - personally and in

his capacity as MTA Police Detective, Jane Doe 2 - personally

and in her capacity as assistant to John Doe 3 in his capacity

as MTA Police Detective, John Doe(s) 4-50, Jane Doe(s) 3-50

-Defendants-

ss: The following is hereby affirmed to be true under penalty
of perjury - except that which is upon knowledge and belief.

1.) On January 29, 2019 at approximately 3:00 p.m. at Grand
Central Terminal the following actions were commenced and
committed by Defendants against Complainant thus violating
Complainant's constitutionally guaranteed civil rights,
subjecting Complainant to but not limited to false imprisonment,
religious persecution, and intentionally causing Complainant
emotional distress but not limited to that or those damages or
actions., including but not limited to violations of the equal
protection clauses, and establishment clauses of U.S. Constitution.

Received

Date: 4-25-19 Time: 3:46 P.M.

Mail ☐ Personal ☒

Robert Lowery

- 2.) At the date time and place stated in above #1., P.O. Daniel Demczuk together with John Doe 1 handcuffed , detained, and placed in a jail cell the Complainant based on no lawful reason thus committing unlawful arrest and unlawful(false) imprisonment against the Complainant.
- 3.) While complainant was handcuffed Demczuk and Doe 1 unlawfully searched and emptied the contents of Complainant's pockets.
- 4.) Demczuk and Doe 1 unlawfully placed Complainant in Jail cell.
- 5.) Demczuk and Doe 1 emptied the contents of Complainant's backpack onto common walkway hall floor. Unlawfully.
- 6.) Demczuk and Doe 1 proceeded to take apart, open and unwrap all items from Complainant's backpack which had been thrown on walkway floor and threw the items back on the common walkway floor.
- 7.) Included in the items thrown on the common walkway floor were a Jewish prayer book, a Mezuza (Jewish scroll), and a page from the Tora.
- 8.) Demczuk and Doe 1 proceeded to step on the items strewn across the common walkway floor including the Jewish Religious objects.

9.) Complainant told Demczuk " you're stepping on a Jewish prayer book" Demczuk responded "Jews have no prayer books".

10.) Complainant later told Demczuk "you're stepping on Jewish ritual objects." Demczuk responded " Jews have no ritual objects."

11.) Complainant constantly asked Demczuk and Doe 1 to pick up objects off the floor. They refused to pick Complainant's objects off the floor.

12.) Complainant asked Jane Doe 1, a female police sgt., to pick up prayer book from the floor. Jane Doe 1 refused.

13.) John Doe 2 , an African-American police officer brought in a visibly homeless man to step on complainant's objects.

14.) John Doe 2 stepped on complainant's objects.

15.) Complainant asked John Doe 2 to pick up Complainant's objects off the floor. John Doe 2 refused.

16.) John Doe 3 was present in small police station while above was going on and took no action.

17.) Jane Doe 2, a dark skinned African American woman in civilian dress, was present in small police station while above was going on and took no action.

18.) John Doe 1, discription, Irish-Anglo face with glasses.

19.) The above stated actions against the Complainant took place under color of law and in violation of the Establishment clause of the US Constitution among other violations and actions against Complainant.

20.) Owen Monaghan, in his capacity as Chief of MTA police has the ability to view real time video of cameras located in MTA police station and by Jail cells where Complainant's civil rights were violated and in fact the whole terminal.

21.) Upon knowledge and belief , Monaghan's office is in the Graybar building directly above and a three minute walk from where Complainant's rights were violated.

22.) Monaghan did not come running down to put a stop to the violations against Complainant.

23.) Monaghan did not delegate to another or supervise another of executive rank to put a stop to the violations against Complainant.

24.) Monaghan is responsible for training and supervising his officers.

25.) Monaghan is delinquent in his responsibilities and is directly responsible for violations against Complainant.

26.) John Doe(s) 4 - 50 and Jane Doe(s) 3 - 50 represent all persons in the MTA police chain of command, or civilian MTA hierarchy responsible for violations against Complainant through delinquency in maintaining proper training and supervising protocol.

27.) There came a time when Complainant was released from cell by Demczuk to be released from detention.

28.) Demczuk told Complainant to pick up his properties

and leave.

29.) Complainant proceeded to examine his items and place them in backpack.

30.) Demczuk told Complainant "hurry up and leave or I'll kick your ass." Demczuk made a threatening lurching motion towards Complainant and held up his fists.

31.) Patrick Foye is responsible for supervising Owen Monaghan as Chief of MTA police, in his capacity as MTA Chairman, and in implementing MTA policy and supervising the policies of the MTA and whose lack of implementation and supervision of those policies or as a result of those policies caused violation of Complainant's rights. Therefore Foye is responsible for violation of Complainant's rights.

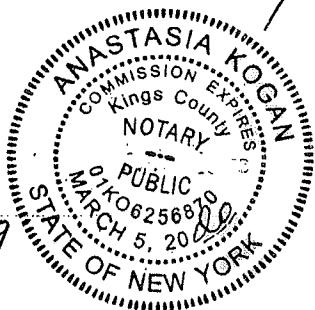
32.) Andrew Cuomo chooses MTA board members, finances MTA, helps to implement MTA policies, and monitors the spending of MTA finances, including the financing of the MTA police and as such Cuomo has the responsibility to make sure police activity financed by such finances is implemented in a responsible manner, which was not done in relationship to violation of Complainant's rights. Cuomo's duties as stated above are in his capacity as governor.

WHEREFORE good reason for taking legal action against the MTA and its branches and relations and personnel for violating Complainant's civil rights and other damages has been presented in this Notice of Claim to take legal action against the above.

Zev Yourman - pro se
Complainant - 1274 49th Street
suite 525, BKLN, NY 11219

Zev Yourman

page 5.



Notary: [Signature]
April 25th, 2019

To: MTA General Counsel - 2 Broadway, 4th floor NYC 10017
Notice of Claim ; Zev Yourman : Complainant

Against :

Metropolitan Transportation Authority,

Patrick J. Foye - Personally, and in his capacity as MTA

Chairman, John Doe(s) 1-50 and Jane Doe(s) 1-50 personally

and as employees of MTA,

M.T.A. General Counsel

Received

Date: 4/25/19 Time: 3:46 PM

Mail ☐ Personal ☒

From: Zev Yourman

ss: The following is hereby affirmed to be true under penalty of perjury except that which is upon knowledge and belief.

1.) Because of the MTA's policy to allow shops in Grand Central Terminal's hall adjacent to Vanderbilt Hall known as the Great Northern Food Court (name upon knowledge and belief) to refuse cash in transactions the following occurred to complainant resulting in damages to complainant.

2.) On January 29, 2019 on or about 2:30 p.m. Complainant approached Grain Bar food stahl in the above stated food court, with intention to purchase food item.

3.) Employees of Grain Bar refused to accept cash from complainant for transaction and refused to sell food item to complainant

4.) A verbal argument ensued. Complainant then walked away.

5.) Employees followed Complainant into main terminal and then into Hudson News Store. A distance of approximately 250 feet and in a different hall from Grain Bar.

6.) Employees of Grain Bar cornered the Complainant in the News Store and threatened to do bodily harm to Complainant.

7.) Police came and falsely arrested Complainant.

8.) The above all occurred against the Complainant directly as a result of MTA's Policy of allowing for the refusal of services to a class of people and its' members, users of cash.

- 9.) The majority of cash users have issues with credit or access to credit. A financial disadvantaged class largely composed of minorities, immigrants, and homeless.
- 10.) MTA caused this Complainant to go hungry as well as others to go hungry (see above #9.)
- 11.) MTA's policies against this class breaches the guaranteed US Constitutional rights of these people and of this Complainant.
- 12.) MTA's violations against this class, and against this Complainant in realm of Causes of Action is not limited to above.

Zev Yourman

Zev Yourman --pro se

Complainant
1274 49th Street
suite 525
Bkln, NY 11219

Notary: Anafan
April 25th, 2019



To MTA General Counsel -2 Broadway , 4th floor NYC 10017

To MTA General Counsel - 2 Broadway, 4th floor NYC 10017

Notice of Claim : Zev Yourman - Claimant

Against

Metropolitan Transportation Authority,

Andrew Cuomo personally and in his capacity as Governor of State of New York and Governor overseer of MTA and appointer to its' board, Patrick J. Foye - personally and in his capacity as MTA Chairman, Owen Monaghan - personally and in his capacity as MTA Chief of Police, Analisa Rosario - personally and in her capacity as MTA Police Detective , Analisa Rosario upon knowledge and belief is also known as Analisa Franca James-Rosario, Daniel Demczuk - personally and in his capacity as MTA Police Officer, John Doe 1 personally and in his capacity as MTA Police Officer - Demczuk's partner, Jane Doe 1 personally and in her capacity as MTA Police Sgt., John Doe 3 personally and as MTA Police Detective , Jane Doe 2 personally and in her capacity as assistant to John Doe 3 in his capacity as MTA Police Detective, John Doe(s) 4-50, Jane Doe(s) 4-50,

- Defendants--

ss: The following is hereby affirmed to be true under penalty of perjury - except that which is upon knowledge and belief.

1.) On January 29, 2019 at approximately 3:00 p.m. at Grand Central Terminal the following actions were commenced and committed by Defendants against Claimant and continuing on and through April 2, 2019, May 9, 2019, July 8, 2019 thus violating Claimant's constitutionally guaranteed civil rights subjecting Claimant to but not limited to Malicious Prosecution , Defamation per se, false arrest, false imprisonment, unlawful search and seizure and the manufactured results of that cover, injury severe and everlasting including but not limited to the compromise of Defendant's safety and security nationally and

Accepted On Behalf Of
Metropolitan Transportation Authority Only

OCT 3 2019

MTA General Counsel's Office

Time 4:48 PM

internationally, and as a member of a class due to Defendant's Violations of the Logan act and Acts of State against the Claimant, and causing emotional distress to Claimant, but not limited to those or various or varied injury caused by Defendants and not limited to those actions or Causes of Action by the Defendants against the Claimant and the various and varied and numerous injury caused by the actions of the Defendant against the Claimant and the damages thereof.

2.) At the date and time and place stated in above #1., P.O. Daniel Demczuk together with his partner John Doe 1 unlawfully arrested and unlawfully imprisoned the Claimant.

3.) Demczuk and Doe 1 THEN committed unlawful search and seizure against the Claimant.

4.) Demczuk and Doe 1 THEN unlawfully placed Claimant in Jail cell.

5.) There came a time while Claimant was in jail cell that Doe 1 and Demczuk started yelling in a jubilant manner "Another Mexican I.D. Card" and were seen by this Claimant through the bars to be passing an item back and forth between them. Jane Doe 1 was nearby.

6.) There came a time after the above situation that Claimant heard Demczuk in the nearby office, sounding like he was yelling into a phone saying "I have a forged Mexican Passport. I want it verified." He then started yelling out numbers and letters.

7.) There came a time after the above phone situation Claimant was led out of the jail cell to a nearby room and seated at a conference table opposite John Doe 3 an MTA Detective and a Black female standing to the side of the table, Jane Doe 2.. Both were in plain clothes.

8.) John Doe 3 said to Claimant " you're being charged with felony possession of a forged Mexican Passport which you used to defraud and injure another." John Doe 3 then read this Claimant the Miranda rights and asked if this Claimant wished to talk. Claimant chose not to talk.

9.) There came a time when complainant was released from custody.

10.) Complainant appeared in Court on three dates to face these fabricated charges April 2, 2019, May 9, 2019, July 8, 2019.

11.) On July 8, 2019 all charges were dropped and case was dismissed and sealed.

12.) The following information came out in court, Demczuk claimed to have recovered a Mexican Consulate identification card from this Claimant during the search and seizure of Claimant.

13.) Demczuk claimed that Detective Rosario informed him that the Mexican consulate confirmed that the identification was fraudulent.

14.) Rosario claimed that all facts furnished by her are true with regards to accusatory instrument, with reference to above #13.

15.) Demczuk's claim of recovery of Mexican card, was, as admitted by him, as a result of the search and seizure of this Claimant.

16.) The search and seizure as well as the initial arrest and imprisonment were unlawful as the initial charges were non-arrestable violations.

17.) Any contraband that Demczuk claimed to have recovered during the unlawful search and seizure would be considered off limits to prosecution as per the fruit of the poisonous tree doctrine. Therefore all issues concerning the Mexican Card were off limits and unprosecutable.

18.) The FBI has stated that the Mexican Consulate Identification Card is issued by the Mexican government and its associates specifically to undermine United States immigration policy and facilitate illegal immigration from Mexico. The FBI has stated that due to the poor quality of production it is impossible to tell a real card from a forged card. Under Federal law any state or local government official through action who accepts the card or concept thereof as legitimate , as in the instant claim, possesses the criminal intent (mens rea) necessary for a felony indictment.

19.) To be specific with regard to Defendants' relationship concerning the issues regarding this card By Defendants' prosecution and going so far as to contact the Mexican government as regards this card , Defendants have shown ad nauseam the lengths to which they will go to recognize the validity and legitimacy of this card concept, in other words there is no prosecution of forging a document unless there is a valid original document from which to be forged. EVEN if that original document is regarded as illegitimate by the Federal government and whose purpose is to undermine Federal policy.

20. The Defendants have violated the Logan act by contacting a foreign government and officially through action taking the side of that government's hostile policy which is intended to undermine United States federal policy.

21.) The Federal Government has established strict standards and protocol for dealing with foreign governments by American citizens, civilians and government officials . These standards are highly regulated and designed to protect American citizens from the hostile interests of foreign governments and their criminal traitorous allies including Rosario , Demczuk and all their fellow criminal traitor Defendants as listed in full in the caption.

22.) Indeed the Defendants served as the de facto prosecutorial arm of the narco-terrorist Mexican government in the instant matter.

23.) The Mexican document prosecution was used as a cover to justify the unlawful arrest and imprisonment on the initial non-arrestable violations charges.

24.) Based on #17. and #18. through #23. the Defendants lacked jurisdiction to prosecute this matter.

25.) The Defendants violated the Espionage act and the Sedition act in the instant matter.

26.) Rosario conveyed sensitive security related information to the Mexican government, jeopardizing the security, life and safety of this Claimant as an individual and as a member of a class including but not limited to the following: MTA commuters, passers by on MTA properties including but not limited to Grand Central Terminal, Users of MTA facilities including but not limited to Grand Central Terminal.

27.) Rosario conveyed the false damaging information concerning this Claimant as found in the criminal charges to the narco-terrorist Mexican regime thus placing this Claimant's life, safety, and security, but not limited to those categories, in everlasting jeopardy not limited to locally, nationally, or internationally.

28.) As has been shown above there has been clear collusion in this matter between Rosario, Demczuk, John Doe 1, Jane Doe 1, John Doe 3, and Jane Doe 2 making this a basis for a RICO claim. Furthermore contact with a foreign government on this level could have only logically and possibly have occurred with acquiescence from the entire MTA chain of command and hierarchy, and even unto the top echelon of state government, and even unto the state itself encompassing all the Defendants as listed in the caption. Further establishing a basis for a RICO claim.

29.) Due to the policies or lack thereof of the MTA .

Due to the implementation of those policies be they harmful, unconstitutional, or unlawful , or due to failure of training or supervisory protocol . be those policies lawful, by those responsible for implementing those policies including but not limited to Owen Monaghan, Patrick Foye, Andrew Cuomo (also see related Notice of Claim dated April 25, 2019 #s 22., 23., 24., 25., 26., 31., 32.) and all the Defendants listed in the caption

Harmful action was caused to this Claimant .

30.) The above stated actions against this Claimant took place under color of law and in violation of Claimant's rights under the US Constitution.

31.) All the Defendants as listed in the caption should have known, could have known, had the ability to know , and did know the harm being perpetrated against the Claimant and had the ability to prevent this harm - which was not done.

32.) Demczuk on the Police Verification/ Arraignment Card falsely stated this Claimant's weight as 180 pounds. Typical of a generic central casting Mexican ethnic laborer. This Claimant wears size 34R slim cut suit jackets and 28 inch waist trousers.

33.) Grain Bar charges:

34.) Besides knowingly falsifying all information and charges regarding an alleged Mexican card

Demczuk

also knowingly falsified all information and charges regarding the alleged Grain Bar incident
Demczuk knowingly and falsely stated that in Grand Central Terminal the defendant did "yell and scream at customers inside of the Grain Bar" "creating" "alarm of more than 10 customers"

34. continued)

" -- The Grain Bar is a simple showcase with room for two employees to work comfortably between the wall and the showcase

Demczuk falsely claims and describes the Grain Bar to be a "food establishment", a restaurant. There is no room for customers. Demczuk knows and has reason to know that Grain Bar is a simple stand as he patrols Grand Central on foot on a regular basis.

35.) Other false words used by Demczuk to disparage this Claimant include but are not limited to "the defendant, with intent to cause public inconvenience, annoyance and alarm and recklessly creating a risk thereof, used abusive and obscene language and made an obscene gesture in a public place". Defendant had "intent to defraud, deceive, and injure another"; "threw a projectile at an individual"

36.) This Claimant did in fact inform Demczuk while he handcuffed him "I didn't do anything, I'm the victim here. Check the videos" Grand Central is heavily under video surveillance both by law enforcement and the individual merchants. Claimant said "I want to press charges." Demczuk responded "Take your complaint downtown." "They have witnesses you don't". He refused to make further inquiry.

37.) A reasonable person making a further inquiry would have found out the following:

Claimant a white male of small stature was denied service by employees of Grain Bar snack stand. Employees refused to accept Claimant's cash. A short disagreement occurred. Claimant walked away. Claimant walked into a different section of Grand Central. Claimant walked into Hudson News store, approximately 300 feet away from Grain Bar.

Claimant found himself surrounded by several large African - American males. One of the African- American males had unnaturally large arm muscles (he was wearing a short sleeve shirt) He said to Claimant "I'm gonna bash your face in!"

37.) continued)

The African- American males were the employees from Grain Bar. They had been stalking this Claimant through Grand Central Terminal.

The Claimant started yelling for the police. The stalkers backed off enough to let the Claimant escape into the adjoining corridor. The stalkers ran into the corridor as well. The MTA Police - Demczuk and partner John Doe 1 approached the stalkers first.

38.) Demczuk immediately handcuffed this Claimant. The witnesses referred to in #36 were the stalkers witnessing each other.

39.) Along with the Mexican Document debacle the phony Grain Bar incident was also used by defendants to maliciously prosecute this Claimant, until they conceded.

40.) Monaghan and his underlings have the ability to view all activity in Grand Central Terminal through the numerous video cameras located along the route of the Grain Bar incident. Defendants had the ability to view the Grain Bar incident in real time and in review. Defendants chose not to do so or chose to ignore what they saw, but not limited to that. If equipment was inoperable this was due to Defendants' incompetence, but not limited to that.

41.) Demczuk and his partner John Doe 1 had the obligation to protect from the stalkers this Claimant which they did not do. Demczuk had the obligation to take down a complaint against the stalkers from this Claimant which he did not do.

42.) The Defendants were not trained properly. The Defendants were not supervised properly. This refers to not only Demczuk and John Doe 1 but all Defendants up and down the line who contributed to the violation of this Claimant's rights in the Grain Bar incident due to their actions or inactions but not limited to the above.

42.) This paragraph represents the previous related claims, notice of claims, and amendment with as much force or greater force as if they appeared here. This hereby incorporates all the briefs in this matter into one.

43.) The stated actions against this Claimant as stated above in relation to the Grain Bar case took place under color of law and in violation of Claimant's rights under the US Constitution.

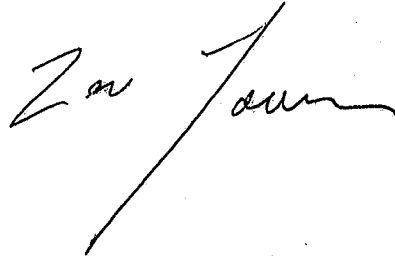
WHEREFORE It is hereby shown through all the statements in the paragraphs above that this Claimant has good cause for legal action against the Defendants listed herein.

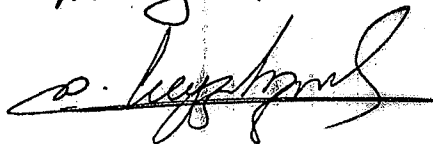
Yours etc.,

Zev Yourman

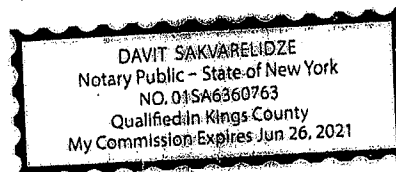
Zev Yourman

1274 49th Street
Suite 525
Brooklyn, NY 11219



Notary Public


10/03/2019





New York City Comptroller
Scott M. Stringer

Office of the New York City Comptroller
1 Centre Street
New York, NY 10007

Form Version: NYC-COMPT-BLA-PI1-M

Personal Injury Claim Form

Claim must be filed *in person or by registered or certified mail within 90 days of the occurrence* at the NYC Comptroller's Office, 1 Centre Street, Room 1225, New York, New York 10007. It must be *notarized*. If claim is not resolved within *1 year and 90 days of the occurrence*, you must start legal action to preserve your rights.

TYPE OR PRINT

I am filing: ☒ On behalf of myself.

☐ On behalf of someone else. If on someone else's behalf, please provide the following information.

Last Name:

First Name:

Relationship to the claimant:

Claimant Information

***Last Name:**

***First Name:**

Address:

Address 2:

City:

State:

Zip Code:

Country:

Date of Birth:

Soc. Sec. #

HICN:

(Medicare #)

Date of Death:

Phone:

Email Address:

Occupation:

City Employee? ☐ Yes ☒ No ☐ NA

Gender ☒ Male ☐ Female ☐ Other

© Attorney is filing.

Attorney Information (If claimant is represented by attorney)

Firm or Last Name:

Firm or First Name:

Address:

Address 2:

City:

State:

Zip Code:

Tax ID:

Phone #:

Email Address:

RECEIVED
CITY OF NEW YORK
COMPTROLLER OFFICE
2019 OCT -3 P 4:39
BUREAU INFORMATION SYSTEM
ROOM 1225 SOUTH

Office of the New York City Comptroller
1 Centre Street
New York, NY 10007

New York City Comptroller
Scott M. Stringer

The time and place where the claim arose

Date of Incident: JAN 29, 2019 → JULY 9 2019 Format: MM/DD/YYYY
Time of Incident: Format: HH:MM AM/PM

Location of Incident:

NY COUNTY DISTRICT
ATTORNEY'S OFFICE
100 CENTRE ST.
80 CENTRE ST.

Address:

Address 2:

City:

State:

Borough:

100 CENTRE ST
NY COUNTY DISTRICT ATTORNEY'S
OFFICE
NYC 80 CENTRE ST
NY
NEW YORK COUNTY
MANHATTAN

Manner in which claim arose:

Attach extra sheet(s) if more room is needed.

MEMBERS OF THE DA'S OFFICE OF NY COUNTY SPECIFICALLY KELLY HEATING, KATHLEEN CONLON, WILLIAM SHARANO AND INCLUDING BUT NOT LIMITED TO CYRUS VANCE - ALSO PERSON, JOHN DOES 1-50, JANE DOES 1-50 DID VIOLATE THIS CLAIMANT'S CIVIL RIGHTS BUT NOT LIMITED TO THAT DAMAGE BY COLLABORING WITH MEMBERS OF THE NYTA POLICE DEPT INCLUDING DETECTIVE ROSARIO IN AN UNLAWFUL INVESTIGATION INCLUDING CONTACT WITH MEXICAN GOVERNMENT OFFICIALS IN INVESTIGATING A FALSE ALLEGATION THAT THIS CLAIMANT POSSESSED A FORGED MEXICAN I.D. CARD AND USED IT TO INJURE & CAUSE HARM TO ANOTHER. CHARGES WERE CONSIDERED 30/31 ON JULY 8, 2019 3 P.M. (MARRY) DEFENDANTS HAD NO JURISDICTION TO PROSECUTE ISSUES ON BEHALF OF THE MEXICAN GOVERNMENT INCLUDING THE MEXICAN I.D. CARD WHOSE PURPOSE IS TO VIOLATE U.S. FEDERAL POLICIES - DEFENDANTS IN HAVING CONTACT WITH THE MEXICAN GOVERNMENT BOTH DIRECTLY AND INDIRECTLY AND GIVE THE MEXICAN GOVERNMENT INFORMATION WHICH WAS FALSE CONCERNING THIS CLAIMANT CAUSED THIS CLAIMANT TO BE UNDER THREAT FROM MEXICAN GOVERNMENT LOCALLY, NATIONALLY & INTERNATIONALLY FINANCIALLY & WITH ~~THREAT~~ THREAT TO CLAIMANT'S SAFETY PHYSICALLY, FINANCIALLY BUT NOT LIMITED TO THAT DEFENDANTS HAD NO RIGHT TO COLLECT & INVESTIGATE THIS MATTER WITH OTHERS VIOLATING RICO - AND VIOLATING UNDER COLOR OF LAW, VIOLATING THE LOYALTY ACT BUT NOT LIMITED TO THAT AND CAUSING HARM TO THIS CLAIMANT AND VIOLATING THIS CLAIMANT'S US CONSTITUTIONAL RIGHTS - BUT NOT LIMITED TO THAT AND CAUSING HARM TO THIS CLAIMANT

The items of damage or injuries claimed are (include dollar amounts)

Attach extra sheet(s) if more room is needed.

10 MILLION DOLLARS PLUS LOCAL FEES AND EXPENSES AND PUNITIVE DAMAGES

ZEV YOURMAN Zev Yourman

Notary Public

10/03/2019

DAVID SAKVARELIDZE
Notary Public - State of New York
NO. 015A6360763
Qualified in Kings County
My Commission Expires Jun 26, 2021